

M E M O R A N D U M

September 21, 1979

TO: ROGER BLAIR, Director
Division of Hazardous Material
& Waste Management

THROUGH: DAN DOLAN, Chief
Hazardous Waste Management Section

FROM: ROBERT KOENTOP, Environmental Specialist *RK*
Hazardous Waste Management Section

SUBJECT: A. L. Taylor Site (Valley of the Drums)

Site: *A. L. Taylor*
Break: *9.1*
Other: _____

RECEIVED
SEP 25 1979
DIV. OF HAZARDOUS MATERIAL
AND WASTE MANAGEMENT.

On September 19, 1979, I called Mr. Al Smith (Federal EPA) concerning the expiration of the contract with OH Materials Company (Findlay, Ohio). He informed me as of October 1, 1979, the state of Kentucky is responsible for all maintenance costs; and as of November 1, 1979, the state is responsible for the total cost of upkeep of the treatment system (general maintenance, pretreatment and electric bills). Therefore, action should be taken immediately to affect a smooth transition from a Federal to a State contractual commitment with OH Materials Company.

NOTE: Because OH Materials did secure the emergency at the A.L. Taylor site, and have been technical advisors since the installment of the treatment system, it seems warranted that they (due to their expertise in the field) continue to be the contracted.

To minimize the costs imposed upon the state, the following procedures should be enacted:

1. Cancel all pretreatment commitments with OH Materials - however, maintain their close technical advisory status.
2. Purchase all equipment needed in the pretreatment process; this could be done directly through or under the advice from OH Materials. Again, because of their expertise on the subject, working closely with OH seems necessary.
3. Have state workers be responsible for the pretreatment spraying and flocculation process.
4. Contract OH Materials for repairs regarding mechanical failures and upkeep of inevitable wear and tear on the system.

The idea here is not just to cut costs but to economically maximize the efforts of all parties involved to keep the problem of the Valley of the Drums



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under control. Due to the proximity of state workers to the problem and the unpredictability of OH personnel being in the area (due to the large area they cover for spill response) it seems necessary for the Division to assume the responsibility of pretreatment.

NOTE: Problems arising, such as mechanical failure, could be dealt with immediately by OH even when no OH personnel are present in the area. The needed personnel could immediately be called in on such a high priority problem. However, when compared to spill response, pretreatment may be labeled low priority, and unwanted delays may occur. This problem does not reflect OH's reliability but the nature of their business.

The aforementioned procedure should be openly and thoroughly considered. After the initial investment, the Division would greatly reduce operating costs while maintaining the standard of treatment which now exists on site.

RK/lrw

cc: Hugh Archer